

# **EXHIBIT 8**

UBER MDL DRAFT DISCOVERY SCHEDULE

	Plaintiffs' Proposed Dates	Uber's Proposed Dates and add'l Milestones	Milestone
1	April 18, 2024	April 26, 2024	<b>Uber</b> shall provide (1) a list of proposed custodians. For each custodian, Uber shall provide all job titles and dates for which the custodian held that title, as well as the date(s) for any litigation holds; (2) provide a list of non-custodial files that can be produced without the use of search terms and a date certain for production.
2	April 19, 2024	April 29, 2024	<b>Meet and confer</b> re: Uber's proposed list of custodians and production of non-custodial files.
3	April 23, 2024	May 3, 2024	<b>Uber shall:</b>  (1) serve any initial objections to First RFPs that would result in the withholding of large portions of documents (i.e., objections that would be made to multiple First RFPS);  (2) identify any First RFPs that objects to into their entirety; (3) identify any First RFPs that are fully covered by documents already produced in the JCCP and provide a date certain for producing those documents to Plaintiffs.  <b>Plaintiffs</b> will submit a proposed list of initial custodians.

	Plaintiffs' Proposed Dates	Uber's Proposed Dates and add'l Milestones	Milestone
4	April 26, 2024	May 10, 2024	<b>Uber</b> shall identify the custodians for which Uber will produce documents.
5	May 1, 2024	May 13, 2024	<b>Meet and confer</b> regarding search terms, custodians, and objections and responses to First RFPs.
6	May 3, 2024	May 20, 2024	<b>Final meet and confer</b> regarding search terms, custodians, and responses to First RFPs.
7	May 7, 2024	June 6, 2024	<b>The parties</b> will submit any dispute over search terms or custodians to the Court.
8	May 15, 2024	May 21, 2024	<b>Uber</b> shall serve responses and begin a rolling production of documents, pursuant to Plaintiffs' May 3 proposal and the parties' April 29 and May 13 discussions.

	Plaintiffs' Proposed Dates	Uber's Proposed Dates and add'l Milestones	Milestone
9	May 29, 2024	May 29, 2024	Uber shall serve initial objections to First Rog's and First RFA's.
10		June 20, 2024	<b>Uber</b> shall serve final objections and responses to First Rog's and First RFA's. (Subject to amendment or supplementation following substantial completion of non-privileged responsive documents in response to First Set of RFPs.)
11		June 27, 2024	<b>Uber</b> shall serve final responses and objections to First RFPs. (Date subject to change, depending upon guidance from the court.)
12	September 1, 2024	September 1, 2024	<b>Uber substantially complete</b> productions of non-privileged responsive documents in response to First Set of RFPs.